

### **REMARKS**

Claims 1-30 are pending in the application. Claims 1, 21, and 28 are amended. Support for the amendments can be found in the originally filed Specification at Figure 3, element 87, and related discussion at paragraph [0034]. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks contained herein.

### **REQUEST FOR TELEPHONIC INTERVIEW**

Applicants have made repeated requests to the Examiner for a telephonic interview before expiration of the deadline for filing the present Response. For example, Applicants' representative of record, Jennifer S. Brooks, contacted the Examiner of Record, Minerva Rivero, and learned that Examination of the present Application had been transferred to Examiner Patrick Edward. Repeated phone messages to Patrick Edward and Mr. Edward's supervisor, David Huspeth, were not returned. In view of Applicants' lack of success in obtaining the interview, Applicants respectfully request that the Examiner contact Applicants' representative to conduct a telephonic interview before issuing a next Office action. Applicants further request the Examiner refrain from issuing a Final rejection in the next Office action in order to afford Applicants a due opportunity to amend the claims following the interview and before Final rejection.

### **REJECTION UNDER 35 U.S.C. § 103**

Claims 1-15, 17-20, and 28-29 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Traynor (U.S. Pat. No. US 2002/0007278) in view of Carter et al. ("An Integrated Biometric Database", IEE Colloquium on Electronic Images and Image

Processing in Security and Forensic Sciences, IEE (1990)). This rejection is respectfully traversed.

The Examiner relies on Traynor to teach that users are allowed to access and control remote appliances by telephone by passing a voice verification step and providing a password, with biometric data for a user being stored for each caller and being coupled with the caller's PIN number. The Examiner relies on Carter et al. to teach accessing a data structure storing associations among different types of biometric data and individual extensions in order to retrieve biometric data associated with an extension being operated by a user. However, Carter et al. merely teach that each subject record in the database includes a voice recording, a signature record, and a face image. Therefore, there is no suggestion or motivation to combine the teachings of Traynor with those of Carter et al. in such a way that two extensions have different types of biometric data associated with them by the database. In other words, in the combination suggested by the Examiner, it might be reasonable to associate all types of biometric data with all extensions; it might also be reasonable to associate the same types of biometric data with each extension. However, only impermissible application of hindsight reasoning could combine the teachings of the references to arrive at Applicant's claimed invention, which involves different types of biometric data being associated with individual extensions. Therefore, Traynor and Carter et al. do not teach, suggest, or motivate that the database associates different types of biometric data with individual extensions, at least two of the extensions being associated with different types of biometric data, in order to retrieve biometric data associated with an extension being operated by the user.

Applicant's claimed invention is generally directed toward a computer telephony system to access secure resources. In particular, Applicant's claimed invention is directed toward a verification/identification system that is adapted to access a data structure storing associations among different types of biometric data and individual extensions in order to retrieve stored biometric data associated with an extension being operated by a user. For example, independent claim 1, as previously presented, recites in relevant part, "said verification/identification system is adapted to access a data structure storing associations among different types of biometric data and individual ones of said extensions, at least two of the extensions being associated with different types of biometric data, in order to retrieve stored biometric data associated with an extension being operated by a user." Independent claim 28, as amended, recites similar subject matter. Support for the amendments may be found in the originally filed specification at paragraph [0034] and Figure 3, element 87. Thus, Traynor and Carter et al. do not teach all of the limitations of the independent claims. These differences are significant.

The differences between Applicant's claimed invention and the combination suggested by the Examiner are significant because the different associations of types of biometric data and individual extensions allows for collection and use of different types of biometric data when different extensions are being employed. As a result, security procedures/levels of extensions can be varied based on the value of a secured resource accessible via a particular extension and/or varying functionality of extensions to measure biometric data. This capability is not found in the Examiner's suggested

combination, in which there is no indication or suggestion that operation of the verification is capable of varying according to the extension being employed.

Accordingly, Applicant respectfully requests the Examiner reconsider and withdraw the rejection of independent claims 1 and 28 under 35 U.S.C. § 102(e), along with rejection on these grounds of all claims dependent therefrom.

Claim 16 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Traynor (U.S. Pat. No. 2002/0007278), in view of Li et al. (U.S. Pat. No. 6,219,793). This rejection is respectfully traversed.

Traynor is generally directed toward a speech activated network appliance system. In particular, the Examiner relies on Traynor to teach that users are allowed to access and control remote appliances by telephone by passing a voice verification step and providing a password. However, Traynor does not teach a verification/identification system that is adapted to access a data structure storing associations among different types of biometric data and individual extensions, at least two of the extensions being associated with different types of biometric data, in order to retrieve stored biometric data associated with an extension being operated by a user.

The teachings of Li et al. are generally directed toward a method for using fingerprints to authenticate access to wireless communications. In particular, the Examiner relies on Li et al. to teach that a terminal ID (in the form of Caller ID) being employed by a caller is validated in addition to the caller's personal ID. However, Li et al. do not teach, suggest, or motivate a verification/identification system that is adapted to access a data structure storing associations among different types of biometric data and individual extensions, at least two of the extensions being associated with different

types of biometric data, in order to retrieve stored biometric data associated with an extension being operated by a user.

Applicant's claimed invention is generally directed toward a computer telephony system to access secure resources. In particular, Applicant's claimed invention is directed toward a verification/identification system that is adapted to access a data structure storing associations among different types of biometric data and individual extensions in order to retrieve stored biometric data associated with an extension being operated by a user. For example, independent claim 1, as amended, recites in relevant part, "said verification/identification system is adapted to access a data structure storing associations among different types of biometric data and individual ones of said extensions, at least two of the extensions being associated with different types of biometric data, in order to retrieve stored biometric data associated with an extension being operated by a user." Support for the amendments may be found in the originally filed specification at paragraph [0034] and Figure 3, element 87. Thus, Traynor and Li et al. do not teach all of the limitations of the independent claim. These differences are significant.

The differences between Applicant's claimed invention and the combination suggested by the Examiner are significant because the different associations of types of biometric data and individual extensions allows for collection and use of different types of biometric data when different extensions are being employed. As a result, security procedures/levels of extensions can be varied based on the value of a secured resource accessible via a particular extension and/or varying functionality of extensions to measure biometric data. This capability is not found in the Examiner's suggested

combination, in which there is no indication or suggestion that operation of the verification is capable of varying according to the extension being employed.

Accordingly, Applicant respectfully requests the Examiner reconsider and withdraw the rejection of claim 16 under 35 U.S.C. § 103(a) based on its dependence from an allowable base claim.

Claims 21-27 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Traynor (U.S. Pat. No. 2002/0007278), in view of Hoskinson et al. (U.S. Pat. No. 5,339,351), Li et al. (U.S. Pat. No. 6,219,793), and Carter et al. ("An Integrated Biometric Database", IEE Colloquium on Electronic Images and Image Processing in Security and Forensic Sciences, IEE (1990)). This rejection is respectfully traversed.

For discussion of the differences between Applicant's claimed invention and the teachings of Traynor, Li et al., and Carter et al., Applicant respectfully directs the Examiner's attention to remarks detailed above with respect to rejection of claims 1 and 16.

The teachings of Hoskinson et al. are generally directed toward an emergency response system. In particular, the Examiner relies on Hoskinson et al. to teach associating a plurality of extensions with a plurality of fixed physical locations and obtaining user extension information that identifies which one of said fixed physical locations the user is located in order to determine where a caller is located so that emergency assistance can be dispatched to the caller in need. However, Hoskinson et al. do not teach, suggest, or motivate a verification/identification system that is adapted to access a data structure storing associations among different types of biometric data and individual extensions, at least two of the extensions being associated with different

types of biometric data, in order to retrieve stored biometric data associated with an extension being operated by a user.

Applicant's claimed invention is generally directed toward a computer telephony system to access secure resources. In particular, Applicant's claimed invention is directed toward a verification/identification system that is adapted to access a data structure storing associations among different types of biometric data, at least two of the extensions being associated with different types of biometric data, and individual extensions in order to retrieve stored biometric data associated with an extension being operated by a user. For example, independent claim 21, as amended, recites in relevant part, "accessing a data structure storing associations among different types of biometric data and individual ones of said extensions, at least two of the extensions being associated with different types of biometric data, in order to retrieve stored biometric data associated with an extension being operated by a user." Support for the amendments may be found in the originally filed specification at paragraph [0034] and Figure 3, element 87. Thus, Traynor, Hoskinson et al., Li et al., and Carter et al. all fail to teach all of the limitations of the independent claim. These differences are significant.

The differences between Applicant's claimed invention and the combination suggested by the Examiner are significant because the different associations of types of biometric data and individual extensions allows for collection and use of different types of biometric data when different extensions are being employed. As a result, security procedures/levels of extensions can be varied based on the value of a secured resource accessible via a particular extension and/or varying functionality of extensions to

measure biometric data. This capability is not found in the Examiner's suggested combination, in which there is no indication or suggestion that operation of the verification is capable of varying according to the extension being employed.

Accordingly, Applicant respectfully requests the Examiner reconsider and withdraw the rejection of claim 21 under 35 U.S.C. § 103(a), along with rejection on these grounds of all claims dependent therefrom.

### **CONCLUSION**

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

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